1 The Honorable Robert S. Lasnik 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 Case No. 2:20-cy-01719-RSL BARCELO HOMES, INC., a Washington 11 corporation; STIPULATED MOTION AND 12 ORDER TO EXTEND DEADLINES Plaintiff, SET BY THE COURT'S DECEMBER 13 27, 2021 ORDER. v. 14 KINSALE INSURANCE COMPANY, a 15 foreign insurance company, 16 Defendant. 17 KINSALE INSURANCE COMPANY, a foreign insurance company, 18 Counterclaim and Third-19 Party Plaintiff, 20 v. 21 BARCELO HOMES, INC., a Washington 22 corporation; Counterclaim Defendant, 23 and 24 TRIBRACH CAPITAL, LLC, a Washington limited liability company; 25 Third-Party Defendant. 26

STIPULATED MOTION AND ORDER EXTENDING DEADLINES SET BY THE COURT'S DECEMBER 27,2022 ORDER - 1 (Case No. 2:20-cv-01719-RSL)

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Pursuant to Western District of Washington Local Civil Rule LCR 7(d)(1) and 10(g), the parties, through their undersigned attorneys, stipulate and move as follows:

STIPULATED MOTION

On December 27, 2021, the Court entered an order (the "Order") allowing the parties to: (1) to Dismiss Certain Parties; (2) to Realign Remaining Parties; (3) to Substitute Counsel; and (4) to Stay Litigation (Dkt. No. 45). The Order also provides that within 30 days of Order being entered that the parties shall present "a stipulated motion and proposed order granting Tribrach leave to file an Amended Complaint pursuant to LCR 15, and providing Kinsale with 30 days to file an Answer thereto." Dkt. # 45.

Tribrach Capital, LLC and Kinsale Insurance Company request a three-week extension to allow them to stipulate and propose an order allowing Tribrach to file its Amended Complaint pursuant to LCR 15. The new dates would be as follows:

- Presentation of stipulated motion and proposed order granting Tribrach leave to file an amended complaint pursuant to LCR 15: February 17, 2022.
- Answer by Kinsale: March 17, 2022

Good cause exists to grant the parties stipulated motion. The parties' are continuing to work in good faith toward an amicable and agreed stipulation and order which will avoid the necessity of the Court's intervention. Accordingly, this short time extension is likely to conserve Court's and the parties' resources.

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STIPULATED MOTION AND ORDER EXTENDING DEADLINES SET BY THE COURT'S **DECEMBER 27,2022 ORDER - 2** (Case No. 2:20-cv-01719-RSL)

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| 1 | It is so stipulated this 27 th day of January, 2022. | |
|----|---|---|
| 2 | s/ Eric Neal (by email auth.) | s/ Tristan N. Swanson |
| 3 | Eric Neal, WSBA No. 31863 Lether Law Group | Tristan N. Swanson, WSBA No. 41934 s/ Carolyn A. Mount |
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| 8 | Attorneys for | Attorneys for Third-Party Defendant |
| 9 | Defendant/Counterclaim/Third-Party Plaintiff Kinsale Insurance Company | Tribrach Capital, LLC |
| 10 | Trainer Rinsare insurance Company | |
| 11 | | |
| 12 | <u>ORDER</u> | |
| 13 | The parties' shall present a stipulated motion and proposed order granting Tribrach leave | |
| 14 | to file an Amended Complaint pursuant to LCR 15 by February 17, 2022. Kinsale shall have | |
| 15 | until March 17, 2022 to provide its Answer. | |
| 16 | IT IS SO ODDEDED | |
| 17 | IT IS SO ORDERED. | |
| 18 | DATED this 31st day of January, 2022. | |
| 19 | MWS Casnik | |
| 20 | | The Honorable Robert J. Lasnik |
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